

THE HONORABLE RICARDO S. MARTINEZ

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

ROBERT KENNY,

Plaintiff,

v.

PACIFIC INVESTMENT
MANAGEMENT COMPANY LLC, a
Delaware limited liability company;
PIMCO INVESTMENTS LLC,

Defendants.

No. CV 14-1987-RSM

**STIPULATION AND [PROPOSED]
ORDER AMENDING ORDER SETTING
DATES AND DEADLINES IN JOINT
STATUS REPORT AND DISCOVERY
PLAN**

NOTE FOR MOTION: JULY 26, 2017

Plaintiff Robert Kenny (“Plaintiff”) and Defendants Pacific Investment Management Company LLC and PIMCO Investments LLC (collectively, “Defendants”), through their undersigned counsel of record, hereby stipulate and agree as follows:

On September 30, 2016, the parties filed a Stipulation and Proposed Order Amending Order Setting Trial Date and Related Dates and Deadlines in Joint Status Report and Discovery Plan (Dkt. 111), wherein the parties requested additional time to complete expanded discovery obligations and to respond to ongoing discovery requests. Finding good cause shown, the Court on October 4, 2016 entered an Order Amending Order Setting Trial Date and Related Dates and

STIPULATION AND [PROPOSED] ORDER
(No. CV 14-1987-RSM) – 1

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Deadlines in Joint Status Report and Discovery Plan (Dkt. 124) (the “Scheduling Order”) amending the case schedule accordingly.

Although the parties have sought to complete fact discovery as expeditiously as possible and continue to work diligently to this end, in light of the overall volume of documents produced, ongoing discovery requests, and difficulties in scheduling fact witnesses’ depositions, the parties have agreed and propose to amend deadlines for the completion of fact discovery and expert witness reports in the Scheduling Order while preserving the current deadlines for completion of expert discovery, filing of dispositive motions, and the current trial date.

IT IS HEREBY STIPULATED, by and among Plaintiff and Defendants, for good cause shown, that the below-referenced deadlines in the Scheduling Order be extended, as proposed below, subject to the Court’s approval:

Event	Current Deadline	Revised Deadline
Fact discovery cutoff	7/28/2017	9/30/2017
Plaintiff shall designate any expert witnesses and serve each expert’s written report pursuant to Fed. R. Civ. P. 26(a)(2)(B) on or before	09/15/2017	10/6/2017
Defendants shall designate any expert witnesses and serve each expert’s report pursuant to Fed. R. Civ. P. 26(a)(2)(B) on or before	11/03/2017	11/24/2017
Plaintiffs shall serve any rebuttal expert reports from previously-designated experts on or before	12/01/2017	12/22/2017

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STIPULATION AND [PROPOSED] ORDER
(No. CV 14-1987-RSM) – 2

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Dated: this 26th day of July, 2017.

By: s/ Michael D. Woerner

By: s/ Tana Lin

By: s/ Laura R. Gerber

By: s/ Ian Mensher

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STIPULATION AND [PROPOSED] ORDER

(No. CV 14-1987-RSM) – 3

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[PROPOSED] ORDER

Pursuant to stipulation by the parties, and for good cause shown, **IT IS SO ORDERED**
this ____ day of _____, 2017.

Hon. Ricardo S. Martinez
United States District Judge

Presented by:

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CERTIFICATE OF SERVICE

I hereby certify that on July 26, 2017, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the email addresses indicated on the Court's Electronic Mail Notice List.

DATED: July 26, 2017

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